

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

JOSHUA BOUDREAUX,

Plaintiff,

V.

NORTON ROSE FULBRIGHT US
LLP,

Defendant.

CIVIL CASE NO. 3:24-cv-00260-D

MOTION TO PROCEED WITHOUT LOCAL COUNSEL

COMES NOW, Plaintiff, Joshua Boudreaux (“Boudreaux” or “Plaintiff”), and brings this his Motion for Leave to Proceed Without Local Counsel and respectfully represents the following:

Plaintiff's counsel has acted as local counsel or lead counsel for several cases within this district and is generally familiar with the rules and procedures. Since Plaintiff's counsel had a residence within this district, complying with Local Rule 83.10 has never before been an issue, but Plaintiff's counsel has since moved out of the district and his office, though within 50 miles of the courthouse, is nonetheless, located in the Eastern District of Texas.

Plaintiff's counsel has reviewed his contacts and cannot think of any lawyers who live within the Northern District and within 50 miles of this courthouse who would consider acting as local counsel on this type of case. Plaintiff Joshua

Boudreaux is on a limited budget for this case, and it would seem to be wasteful of his resources to require his law firm to cold call law offices looking for local counsel when Plaintiff's counsel already has previous experience litigating cases in this district.

Plaintiff's counsel has previously acted as local counsel in the following cases in this District: *Warren v. Olympus America, Inc.*, No. 3:22-cv-2876; *State of Texas v. Mayorkas*, No. 2:22-cv-94; *State of Texas et al v. Biden et al*, 3:22-cv-00780 and as lead counsel in the case of *The Patriot Voice, Inc. v. Total System Services, LLC*, 4:23-cv-896.

In Plaintiff's counsel's experience, it is exceedingly difficult to find lawyers to act as local counsel for clients suing employers for terminating them for refusal to be vaccinated against COVID-19 on religious grounds. Rather than incur fees for Plaintiff by engaging in what will likely be a lengthy, time-intensive, and possibly fruitless search for local counsel when Plaintiff's counsel is already familiar with legal practice in this district, Plaintiff hereby motions to court for leave to proceed without local counsel under LR 83.01.

WHEREFORE, Plaintiff Joshua Boudreaux requests that the Court grant leave for Plaintiff's counsel to proceed without local counsel.

Respectfully submitted,

/s/ Paul M. Davis
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ATTORNEY FOR PLAINTIFF
JOSHUA BOUDREAUX

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing motion on all counsel of record via the Court's ECF system on this 6th day of June 2024.

/s/ Paul M. Davis

Paul M. Davis

CERTIFICATE OF CONFERENCE

I hereby certify that I conference with defense counsel by email on June 6, 2024 and defendant is unopposed to this motion.

/s/ Paul M. Davis

Paul M. Davis